

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
v. : DATE FILED _____
SEAN MCINTYRE : **VIOLATIONS:**
18 U.S.C. § 2113(d) (armed bank robbery
-1 count)
18 U.S.C. § 2113(a) (bank robbery - 2
counts)
Notice of additional factors

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about July 21, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

SEAN MCINTYRE

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 3400 Aramingo Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,759, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant SEAN MCINTYRE, did knowingly and unlawfully assault and put in jeopardy the lives of the employees of Wachovia Bank, and other persons, by use of a dangerous weapon, that is, that is a hoax explosive device.

In violation of Title 18, United States Code, Section 2113(d).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 31, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

SEAN MCINTYRE

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 3400 Aramingo Avenue,, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$6,160, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 20, 2004, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

SEAN MCINTYRE

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Wachovia Bank, 3400 Aramingo Ave., Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,109, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Counts One, Two and Three of this indictment, defendant **SEAN MCINTYRE**:

- a. Took the property of a financial institution, as described in U.S.S.G. § 2B3.1(b)(1).
- b. Made a threat of death, as described in U.S.S.G. § 2B3.1(b)(2)(F).
- c. Brandished a dangerous weapon, as described in U.S.S.G. § 2B3.1(b)(2)(E).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney